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7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 INNOVATIV MEDIA GROUP, INC.; TTP8,  
LLC

Case No. 2:22-cv-001184-JCM-EJY

(Consolidated with Case No. 2:22-cv-01362)

11 Plaintiffs,

12 vs.

13 MICHAEL BEYS; RICHARD DE SILVA;  
LATERAL U.S. OPPORTUNITIES FUND  
14 AI, L.P.; LATERAL U.S. CREDIT  
OPPORTUNITIES FUND QP, L.P.;  
15 LATERAL CREDIT OPPORTUNITIES,  
LLC; LATERAL INVESTMENT  
16 MANAGEMENT, LLC; LATERAL FTE  
FEEDER, LLC; LATERAL JUSCOM  
17 FEEDER, LLC; FTE NETWORKS, INC.

**STIPULATION AND ORDER**  
**EXTENDING BRIEFING DEADLINES**  
**FOR DEFENDANTS' MOTION TO**  
**DISMISS OR, ALTERNATIVELY, FOR**  
**SUMMARY JUDGMENT [ECF NO. 93]**

**(SECOND REQUEST)**

18 Defendant.

19  
20 Plaintiffs Innovativ Media Group, Inc. ("Innovativ") and TTP8, LLC ("TTP8," and  
21 with Innovativ, "Plaintiffs"), and Defendants Michael Beys, Richard De Silver, Lateral U.S.  
22 Opportunities Fund AI, L.P., Later U.S. Credit Opportunities Fund OP, L.P., Lateral Credit  
23 Opportunities, LLC, Lateral Investment Management, LLC Lateral FTE Feeding, LLC,  
24 Lateral Justcom Feeder, LLC and FET Networks, Inc. (collectively, "Defendants," and with  
25 Plaintiffs, "the Parties"), by and through their respective counsel of record, hereby stipulate  
26 and agree and jointly request as follows:

27 1. On December 6, 2023, Defendants filed ECF No. 93, titled "Defendants': (1)  
28 Renewed Motion to Dismiss, or, in the alternative for Summary Judgment as to original

1 claims in Case No. 2:22-cv-01184 pleaded in Amended Complaint [ECF 34]; And (2)  
2 Renewed Motion to Dismiss Innovativ’s claims in Consolidated Case No. 2:22-cv-01362-  
3 CDS-VCF, Amended Complaint [ECF 52].”

4 2. Plaintiffs’ opposition was due December 27, 2023, but on December 20,  
5 2023, the Parties entered into a stipulation [ECF No. 95] to extend briefing deadlines, which  
6 the Court reduced to Order [ECF No. 96] on December 22, 2023, moving Plaintiffs’  
7 deadline to February 2, 2024.

8 3. Since the Parties’ first stipulation, one of Plaintiffs’ counsel suffered from  
9 pneumonia, causing him to be unable to prepare Plaintiffs’ opposition, while the other of  
10 Plaintiffs’ counsel had a newborn baby in the same time period.

11 4. The foregoing being submitted as good cause for an additional extension, the  
12 Parties now jointly request, stipulate, and agree to modify the existing deadlines as follows:

13 a. Plaintiffs’ deadline to file a response to Defendants’ Motion [ECF No.  
14 93] shall be extended from February 2, 2024 to **February 16, 2024**; and,

15 b. Defendants’ deadline to file reply to their Motion shall be extended  
16 from February 16, 2024 to **March 1, 2024**.

17 Dated this 31st day of January, 2024

Dated this 31st day of January, 2024

18 **MARQUIS AURBACH**

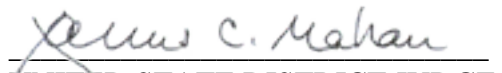
**LEX DOMUS LAW**

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**ORDER**

DATED: February 5, 2024

  
UNITED STATE DISTRICT JUDGE